

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
----- X  
KHALED SALEM, :  
 :  
 Plaintiff, : 05 CV 5518 (MBM)  
 :  
 LANSDELL PROTECTIVE AGENCY, INC., :  
 :  
 Defendant. :----- X

Defendant Lansdell Protective Agency, Inc. and Plaintiff Khaled Salem (collectively referred to herein as "the Parties") submit this joint written report as required by Rule 26(f) of the Federal Rules of Civil Procedure.

Description of Meeting and Settlement Position

1. On January 17, 2006, a meeting was held by telephone conference. The meeting was attended by Laurent S. Drogin and Tara Toevs for Defendant Lansdell Protective Agency, Inc. and Alexander A. Reinert for Plaintiff Khaled Salem.
2. The Parties discussed all discovery and settlement aspects of the above-referenced matter as provided by Rule 26(f) of the Federal Rules of Civil Procedure.
3. The Parties agree that there is no likelihood for a prompt settlement or resolution of this matter.

Designation of the Case

4. The Parties agree that this case should be designated Standard.

Discovery

5. The Parties mutually agreed to and exchanged initial disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure by January 13, 2006.

6. The Parties agree that discovery is needed on all of Plaintiff's claims and Defendant's defenses.

7. The Parties agree that all discovery should be completed by July 17, 2006.
8. The Parties do not believe that any other changes to the limitations on discovery are required.

Joinder and Amendment of Pleadings

9. The Parties agree that any additional parties must be joined by February 17, 2006.
10. The Parties agree that the last day to amend pleadings shall be March 17, 2006.

Dispositive Motions

11. The Parties agree that all potentially dispositive motions must be filed by September 17, 2006.

Consent to Trial by Magistrate Judge

12. The Parties have not agreed to consent to trial by Magistrate Judge.

Early Neutral Evaluation

13. The Parties agree that early neutral evaluation will not be helpful for an early resolution of this action.

Dated: New York, New York  
January 17, 2006

KOOB & MAGGOLAGHAN  
Attorneys for Plaintiff

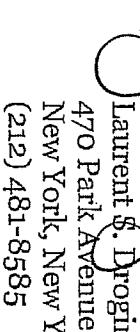
By:

  
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